

John L. Carley  
Assistant General Counsel  
(212) 460-2097  
FAX: (212) 677-5850  
Email: carleyj@coned.com

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Honorable Kristi Izzo  
Secretary  
State of New Jersey  
Board of Public Utilities  
Two Gateway Center  
Newark, New Jersey 07102

Re: Proposed Subchapter 8. Vegetation Management (Tree Trimming)  
Standards

Dear Secretary Izzo:

The Board of Public Utilities ("Board") has issued for comment proposed Vegetation Management (Tree Trimming) Standards ("Tree Trimming Standards"). By this letter, Rockland Electric Company ("RECO") submits its comments regarding the Tree Trimming Standards. For ease of reference, RECO will address the provisions of the Tree Trimming Standards in chronological order.

- 14:5-8.4 This section would require each public utility to inspect the vegetation in proximity to all energized facilities at least once every four years. RECO has no objection to this proposed requirement.
- 14:5-8-5 This section would require a public utility to perform vegetation management in compliance with the standards and documents listed in Section 14:5-8-5(d). RECO does not object to complying with most of these standards and documents. RECO does object, however, with being required to comply with No. 5 - Pruning Standards for Shade Trees, published by the New Jersey Board of Tree Experts. Specifically, RECO does not believe that a utility can complete pruning in the proximity of energized facilities in compliance with the dictates of No. 1, Pruning Trees Near Electric Utility Lines, and also comply with No. 5 - Pruning Standards for Shade Trees. Accordingly, RECO recommends that No. 5 - Pruning Standards for Shade Trees, be deleted from the list.

- 14:5-8-5(e) RECO is unclear as to what this subsection requires. It would appear that Board Staff is in a comparable position with RECO in being able to determine whether these standards and documents have been modified or amended. RECO would request that the Board clarify this provision.
- 14:5-8-5(f) This subsection would require a public utility to ensure that its contractors comply with these requirements. First, this subsection should be limited to contractors “*who perform vegetation management services*”. Second, RECO is not a guarantor for its contractors. RECO will ensure that all of its agreements with contractors, who provide vegetation management services, contain a provision requiring that contractors be aware of and abide by such rules and regulations.
- 14:5-8-6 Subsection (a) would require public utilities to provide training to contractors. This requirement goes too far. While a public utility plainly should be responsible for its own employees, contractors should be responsible for training their own employees. Utilities and their customers should not be responsible for shouldering this burden. Similarly, subsection (b) should be revised so that contractors are responsible for maintaining their own records.
- 14:5-8-7 This section requires the public utility to notify all affected property owners of the scheduled vegetation management activities. RECO’s practice is to do a mass mailing to an area before vegetation management activities commence. In subsection (a), RECO would suggest that notice be provided at least five days (as opposed to seven days) before the activities are to be performed. Regarding subsection (b), while RECO will know the date and content of a mailing, RECO does not track the recipients of such mailing. The typical mailing utilized by RECO covers all billing addresses within a substation area in which the vegetation management activities are to be performed. Occasionally, a mailing goes to a billing address that is not the actual home in the work area. Currently, RECO has no way to track each recipient. Sending a utility representative to each home in the work area would be a financial burden, and extremely inefficient. RECO also would note that most municipalities in its service territory do not encourage a door hanger notification. If left for a few days on a door, the notification indicates that no one is home, and thereby encourages crime. In fact, RECO has been instructed by several police jurisdictions not to leave such door hanger notifications at homes. RECO has found that a mass mailing, in a separate envelope, works very well.
- 14:5-8-8(a) RECO agrees that an increased public awareness of public utilities’ vegetation management practices should be encouraged. Since bill stuffers are very often discarded without being read, RECO prefers to utilize stand-alone mailings.
- 14:5-8-8(b) This subsection would require public utilities to conduct public information programs. RECO is unclear as to exactly what this subsection requires. Publication of educational material on RECO’s website should suffice. RECO would request that the Board clarify this provision.

RECO thanks the Board for the opportunity to submit these comments on the proposed Tree Trimming Standards. Please place these comments on the Board's Tree Trimming Website. Please contact me if you have any questions regarding these comments or require any additional information.

Very truly yours,

John L. Carley  
Assistant General Counsel